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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

PHILIP WOLFE, *et al.*,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal
corporation, *et al.*,

Defendants.

Case No. 3:20-cv-01882-SI

**DECLARATION OF BRIAN S.
ACUNA**

I, Brian S. Acuna, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. This declaration is based on my personal knowledge and information made available to me in the course of my official duties.
2. I am employed by the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Office of Enforcement and Removal Operations (ERO). From July 2020 through November 2020, and again since March 2021, I have served as the acting Deputy Assistant Director, ICE ERO Fugitive Operations Division, within the Enforcement Division in Washington, D.C. Prior to this assignment, I held the position of Unit Chief, National Fugitive Operations Program, within ERO's Enforcement Division from December 2019 to July 2020.
3. During my tenure as a Deportation Officer, I was a member of the El Paso Field Office ERO Special Response Team (SRT), where I held the position of Operator and Team Leader. To perform the duties of this position, I attended the ICE SRT Basic Operators Course in Ft. Benning, Georgia; qualification training sessions with the U.S. Bureau of Prisons Disturbance Control school at the Federal Law Enforcement Training Center in Artesia, New Mexico; the Doña Ana County Sheriff's Office SWAT course; and the Texas Tactical Police Officer's Association SWAT school in Grapevine, Texas.
4. ICE ERO Enforcement Division oversees ERO's SRTs on a national level. ERO SRT teams when deployed report and receive direct oversight from a Tactical Supervisor, who must complete all training requirements for SRT participants and may attend other courses, including Disturbance Control Tactics (DCT), in order to familiarize him/herself with all other ERO tactical programs. ERO SRT Team Leaders and Operators likewise must attend the ERO SRT Basic Operators Course in Ft. Benning, Georgia.
5. ICE personnel have not used strobe lights as part of its crowd control practices in Portland.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 15th day of March 2021.



BRIAN S. ACUNA